



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON THOMPSON,

Defendant.

CR No.

**CR 18 00278-R**

I N D I C T M E N T

[18 U.S.C. § 1014: False Statement to a Financial Institution; 18 U.S.C. § 1029(a)(2): Use of an Unauthorized Access Device; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1014]

On or about September 27, 2017, in Los Angeles County, within the Central District of California, defendant BRANDON THOMPSON ("THOMPSON") knowingly made false statements and reports to NBT Bank, N.A. ("NBT"), an institution the accounts of which were insured by the Federal Deposit Insurance Corporation, for the purpose of influencing the actions of NBT, in connection with an application to obtain a loan. Specifically, in an application for a loan from NBT to pay for dental work, defendant THOMPSON falsely represented to

1 NBT that his name was "C.W.," that his date of birth was XX-XX-81,  
2 and that his social security number was XXX-XX-1953 when, in truth  
3 and in fact, as defendant THOMPSON well knew, his name was not  
4 "C.W.," his date of birth was not XX-XX-81, and his social security  
5 number was not XXX-XX-1953.

COUNT TWO

[18 U.S.C. § 1029(a)(2)]

On or about September 27, 2017, in Los Angeles County, within the Central District of California, defendant BRANDON THOMPSON, knowingly and with intent to defraud, used an unauthorized access device, as defined in Title 18, United States Code, Sections 1029(e)(1) and (3), namely, a social security number belonging to C.W., and by such conduct obtained things of value aggregating at least \$1,000 during a one-year period, with said use having an effect on interstate and foreign commerce.

COUNT THREE

[18 U.S.C. § 1028A(a)(1)]

On or about September 27, 2017, in Los Angeles County, within the Central District of California, defendant BRANDON THOMPSON ("THOMPSON") knowingly possessed and used, without lawful authority, means of identification that defendant THOMPSON knew belonged to another person, namely, the name and date of birth of C.W., during and in relation to the offense of Use of an Unauthorized Access Device, a felony violation of Title 18, United States Code, Section 1029(a)(2), as charged in Count Two of this Indictment.

A TRUE BILL

/s/  
Foreperson

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